

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN, et al.,

Plaintiffs,

v.

Case No. 6:23cv00054

THE CITY OF LYNCHBURG, et al.,

Defendants.

DEPOSITION OF AQUASHA SANDIDGE

October 25, 2024

10:25 a.m. - 10:47 a.m.

Lynchburg, Virginia

REPORTED BY: Kimberly A. Henderson, RPR

1 Deposition of AQUASHA SANDIDGE, taken and
2 transcribed on behalf of the Defendants, pursuant
3 to notice and/or agreement to take depositions; by
4 and before Kimberly A. Henderson, a Registered
5 Professional Reporter and Notary Public in and for
6 the Commonwealth of Virginia at Large; commencing
7 at 10:25 a.m., October 25, 2024, at the offices of
8 the Lynchburg City Attorney, 900 Church Street,
9 Lynchburg, Virginia.

10 APPEARANCES OF COUNSEL:

11
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23 JOHN R. FITZGERALD, ESQUIRE
24 Counsel for the Defendants
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I N D E X

WITNESS

PAGE

AQUASHA SANDIDGE

Examination by Mr. Guynn

4

Examination by MR. VALOIS

21

1 (10:25 a.m., October 25, 2024)

2
3 AQUASHA SANDIDGE

4 was sworn and testified as follows:

5 E X A M I N A T I O N

6 BY MR. GUYNN:

7 Q. Good morning.

8 A. Good morning.

9 Q. My name is Jim Guynn. I represent
10 the defendants in the lawsuit that you brought, and
11 as I'm sure Mr. Valois has told you, I'm going to
12 be asking you some questions this morning. If you
13 don't understand my question, or if you don't hear
14 it, just tell me, and I'll be glad to either repeat
15 it or clarify it. But if you do answer the
16 question, I'm going to assume that you both heard
17 it and understood it. Okay?

18 A. Okay.

19 Q. The other thing I would ask you to do
20 is speak up so the court reporter can hear you, so
21 she can get a good transcript. And I'll try not to
22 start my next question until you finish your
23 answer. And if you can wait and start your answer
24 until I finish the question, it will help her on
25 the transcript.

1 The last thing would be try and
2 answer with a word as opposed to uh-huh or huh-uh,
3 because she can't spell uh-huh or huh-uh, and it
4 won't show up well in the transcript. Okay?

5 A. Yeah.

6 Q. My understanding is your name is
7 Aquasha Sandidge?

8 A. Yes.

9 Q. Okay. How old are you?

10 A. 23.

11 Q. Where do you live?

12 A. I live at 6105 Old Mill Road.

13 Q. Are you married?

14 A. No.

15 Q. Who do you live there with at 6105
16 Old Mill Road?

17 A. Just me and my children, my three
18 kids.

19 Q. You have three kids?

20 A. I do.

21 Q. How old are they?

22 A. Four, two, and one.

23 Q. Does the four-year-old go to school,
24 like at a pre-kindergarten?

25 A. Yes.

1 Q. What school?

2 A. It's called Head Start.

3 Q. And what's your educational
4 background? Did you finish high school?

5 A. I did not.

6 Q. We're here, as you know,
7 Ms. Sandidge, about an incident that occurred in
8 April of 2020 with the police.

9 Do you remember that?

10 A. Yes.

11 Q. Okay. And if I said it occurred on
12 April 28th, 2020, does that sound about right?

13 A. Yes.

14 Q. So tell me when you first became
15 aware, or how you first became aware, that the
16 police were there?

17 A. I looked out the window. It was
18 nighttime, and I was eating, and I walked over to
19 the window and seen --

20 Q. And saw the lights?

21 A. Yeah, uh-huh.

22 Q. Who else did you see?

23 A. Just my brother was in the truck.

24 Q. Was it a truck or a car?

25 A. I think it was a truck. I'm not

1 sure. I think it was a truck.

2 Q. Don't recall?

3 A. Right, I don't.

4 Q. And this was at your mother's house,
5 your mother's apartment?

6 A. Yes, uh-huh.

7 Q. So what did you do? Did you go
8 outside?

9 A. Yes. Me and my mother, we went
10 outside.

11 Q. And when you got out there, what was
12 going on?

13 A. He was being questioned, I do
14 believe. I don't recall everything. I don't
15 remember a lot from that night.

16 Q. Police officers were talking to your
17 brother?

18 A. Yes. I think it was just one there
19 at the moment. I'm not sure.

20 Q. Have you had an opportunity to look
21 at any video of this incident since then, before
22 now?

23 A. I think I've seen one.

24 Q. Did you take any video of the
25 incident?

1 A. I did.

2 Q. And where is that video? Is it
3 stored somewhere, on like a phone or a --

4 A. I think my mom has it. Right?

5 MR. VALOIS: Is it the one on that
6 tablet? I don't want to interrupt. I can help
7 clarify it. Is it the one on that dead tablet
8 thing?

9 THE WITNESS: She said she has mine.

10 MR. VALOIS: Yeah, I think, I think
11 that's the same one. I don't -- I do not
12 personally vouch for any particular video, but I
13 think that's what we're talking about.

14 BY MR. GUYNN:

15 Q. Did it appear that -- how was the
16 conversation going between the police officer and
17 your brother?

18 A. I honestly don't recall that.

19 Q. Were they yelling at each other?

20 A. No, not at the time, no.

21 Q. Okay. Did they ever yell at each
22 other?

23 A. No. I just, I remember the -- I
24 think it was Officer Grooms, I think, the woman, it
25 was the woman. So, no, there was no yelling.

1 Q. Did you see them take your brother
2 out of the car?

3 A. Yes, yes, I think so. Yeah, I did.

4 Q. So from a perspective standpoint, if
5 that's sort of the door to your mother's apartment,
6 was the car straight out, was it more to the left,
7 more to the right? Or from your side that would be
8 the left or right or whatever?

9 A. I don't know.

10 Q. Do you recall where you were standing
11 with regard to the car itself?

12 A. Could I see the car, are you asking
13 me could I see it?

14 Q. No, no. Where you were standing, you
15 know, you were in front of the car; right?

16 A. Uh-huh, yeah.

17 Q. Were you to the right of it or to the
18 left of it?

19 A. I don't know. I think I was in front
20 of it, or on the side.

21 Q. Okay. So it may have been hard to
22 see them taking your brother out of the car, or
23 whatever, from where you were?

24 A. I could see, though, a little bit.
25 It was just a lot going on that night anyway; so.

1 Q. Okay. When you say "a lot going on,"
2 with this incident, or was there some other stuff
3 going on?

4 A. Just the same incident. I was
5 recording, trying to record, and then I had kind of
6 got distracted anyway when my mom had got
7 handcuffed. So I kind of turned away from what was
8 going on there, and was here, and then, you know,
9 an officer, or detective, grabbed me after that;
10 so.

11 Q. Did you stop recording?

12 A. When?

13 Q. At any time?

14 A. I think once I hit the ground,
15 because they took my phone. But I didn't stop
16 recording. I was still recording.

17 Q. Were you recording with the tablet
18 and the phone?

19 A. No, I just had my phone. I never had
20 a tablet.

21 Q. So has the video from your phone been
22 moved to the tablet?

23 A. I'm not sure.

24 Q. A few minutes ago, we were talking
25 about the video being on the tablet that your mom

1 has?

2 A. Right. She told me that she brought
3 back my video, so I don't know where it actually
4 is.

5 Q. So the video that -- you weren't, you
6 didn't take video with the tablet?

7 A. No.

8 Q. Okay. So the video from your phone
9 has gotten to the tablet in some way?

10 A. I do believe so. I'm not sure.

11 Q. Right. I got you.
12 Somebody else did that?

13 A. Right.

14 MR. VALOIS: And if you want to bring
15 Shanta back in and open it back up to ask her about
16 it, that might -- that might be fruitful.

17 MR. GUYNN: Yeah, I might do that.

18 BY MR. GUYNN:

19 Q. I think I understand what you're
20 telling me.

21 A. Okay.

22 Q. You recorded it on the phone; your
23 mother said she brought it back, and it was on the
24 tablet?

25 A. Right. That's what she told me

1 earlier, yeah.

2 Q. Okay. All right. And you said you
3 stopped -- well, you didn't stop recording the
4 video when you were on the ground?

5 A. No.

6 Q. Okay. When did the video stop? And
7 the only reason I'm asking this, I haven't seen it,
8 so I don't know.

9 A. Probably once I hit the ground,
10 honestly, because, you know, it really wasn't
11 showing anything after that.

12 Q. Okay.

13 A. And then I think he took my phone,
14 and I was yelling, to tell him give it to my dad.

15 Q. Had your dad come out by that point?

16 A. Yes. Yes, I think he tried to, but I
17 think they pushed him back in the door.

18 Q. So you said that you were taken to
19 the ground?

20 A. Yes.

21 Q. Who took you to the ground?

22 A. I think his name is Millers,
23 Detective Millers, I think. I'm not sure.

24 Q. Was he in a uniform, or did he have
25 on just street clothes?

1 A. I think it was different from an
2 actual, you know, police uniform.

3 Q. Again, detectives usually don't wear
4 the uniforms --

5 A. Right.

6 Q. -- so that's why I was thinking that.
7 All right.

8 Do you know why he took you to the
9 ground?

10 A. I do not. Well, because I guess I
11 wouldn't allow him to arrest me.

12 Q. How did you -- how did you not allow
13 him to arrest you? Was it that you wouldn't allow
14 yourself to be handcuffed?

15 A. Right. So when I turned to see why
16 my mom was being arrested, he came, I seen him
17 coming towards me and he grabbed me, and I was
18 trying to figure out why. So I didn't think, you
19 know, I was doing anything wrong by, you know,
20 trying to pull away from him, because I don't
21 understand what I did wrong. So, yeah.

22 Q. Did your mom go over to assist your
23 brother?

24 A. I think she tried to, yeah.

25 Q. What kept her from doing -- you said

1 she tried to, what kept her from it, or did
2 anything?

3 A. Well, from what I seen, like I said,
4 she was being arrested, so I, when she was doing
5 all that, like I said, I didn't catch everything.

6 Q. Okay.

7 A. So I don't really know.

8 Q. So you didn't see -- let me ask it
9 this way. You and your mom came out of the
10 apartment, and there's a sidewalk, I guess, on the
11 front?

12 A. Yes.

13 Q. And you were both standing on the
14 sidewalk, weren't you?

15 A. Yes.

16 Q. And then at some point, your mom was
17 over trying to assist your brother when she was
18 arrested?

19 A. Right.

20 Q. But you didn't see what she did when
21 she went over there?

22 A. No, I did not.

23 Q. Okay.

24 MR. VALOIS: Objection to leading,
25 leading form. If I say an objection, you still

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1 have to answer unless I tell you not to talk.

2 THE WITNESS: Okay.

3 MR. VALOIS: You can answer. I'm
4 just putting an objection on for the paperwork.
5 Okay.

6 BY MR. GUYNN:

7 Q. So after you were arrested, what
8 happened next?

9 A. I was put into the car.

10 Q. To one of the police vehicles?

11 A. Yes.

12 Q. Were you taken somewhere?

13 A. Downtown.

14 Q. And where downtown did you go?

15 A. To the magistrate office.

16 Q. What happened at the magistrate
17 office?

18 A. They asked what happened.

19 Q. Did they ask you, or did they ask the
20 officers?

21 A. They were first. Both, I do believe,
22 yeah, it was both of us, so they were going first,
23 and then after, it was me.

24 Q. And when you say they asked you, do
25 you mean the magistrate asked?

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1 A. Yes.

2 Q. And what did the police officer say?

3 A. That I hit him, or grabbed him from
4 behind or something. That was the detective that
5 stated that, and then it was a police officer
6 standing with him.

7 Q. And did the police officer standing
8 there with him say anything about you?

9 A. They were whispering, so I didn't
10 really hear anything. He like agreed with him, or
11 whatever they were writing down.

12 Q. The police officer agreed with the
13 detective?

14 A. Yes.

15 Q. Do you know which police officer it
16 was?

17 A. I do not.

18 Q. Did you have a chance to talk to the
19 magistrate?

20 A. I don't remember.

21 Q. So when -- what happened after the
22 officers talked to the magistrate?

23 A. I don't remember that either.

24 Q. Okay. Did you go home that day?

25 A. No, I didn't.

1 MR. VALOIS: I'm going to object to
2 foundation. I think it might be helpful to
3 describe what a magistrate is. I don't think she
4 understands. When you're saying magistrate, I
5 don't know that she understands what that person
6 is.

7 Do you know what a magistrate is?

8 THE WITNESS: Talking about the
9 people downtown, where they asked you what
10 happened, right? Where you go to tell them what
11 happened?

12 MR. VALOIS: Well, the police?

13 THE WITNESS: The police?

14 MR. VALOIS: Well, I think she may be
15 conflating the police officer's questioning her at
16 the jail versus the magistrate behind the glass,
17 taking her oath and stuff.

18 THE WITNESS: No. I know what he's
19 saying.

20 MR. VALOIS: Okay. Never mind.

21 BY MR. GUYNN:

22 Q. I think we were on the same page,
23 weren't we?

24 A. Yes.

25 Q. You were, the officers went in with

1 you, there was somebody behind the window --

2 A. Right, yeah.

3 Q. -- asked the officers questions?

4 A. Uh-huh. I even remember when I
5 giggled, because I heard him when he lied on me and
6 said that I hit him. And I think, you know,
7 because of me laughing is probably why they locked
8 me up.

9 Q. All right. Did they take you
10 straight from the magistrate's office to the jail?

11 A. Yes, I do believe so.

12 Q. Okay. And then did you have
13 any -- were you questioned by anybody at the jail?

14 A. No.

15 Q. Okay. When they checked you in at
16 the jail, did they ask you a bunch of questions
17 about your health and things like that?

18 A. Yes.

19 Q. And gave you a uniform to put on?

20 A. Yes.

21 Q. Did they put you in a -- I take it,
22 in a cell?

23 A. Yes.

24 Q. And was that a cell and -- like that
25 opened up to a big area with a TV in it and all

1 that?

2 A. It was the holding cell.

3 Q. Okay. So you were in the holding
4 cell in the beginning?

5 A. Yes.

6 Q. Were you ever -- how long were you in
7 the jail?

8 A. It was either five to seven days.

9 Q. Did you stay in the holding cell the
10 whole --

11 A. Yes.

12 Q. -- five or seven days?

13 A. I did.

14 Q. And was that the jail just right down
15 here in Lynchburg?

16 A. Yes.

17 Q. I know it was jail, okay, but
18 otherwise, I mean, were the people who worked in
19 the jail, did they treat you fairly?

20 A. Yes.

21 Q. Did you have any other interviews
22 with any police officers during the time that you
23 were in jail?

24 A. No.

25 Q. Once you got out of jail, you then

1 had to go to court; right?

2 A. Right.

3 Q. And I don't know how long it was
4 between the two?

5 A. Me neither.

6 Q. But did you talk to any police
7 officers between the time you got out of jail and
8 went to court?

9 A. No.

10 Q. Prior to this incident, did you know
11 any of those police officers?

12 A. No.

13 Q. Have you had occasion to run into
14 them since then?

15 A. No.

16 Q. Have you had any other experiences
17 with police officers that were negative?

18 A. No.

19 Q. When they put you on the ground, did
20 you suffer any injuries?

21 A. No.

22 Q. Have you sought any medical treatment
23 as a result of this incident?

24 A. No.

25 Q. Are you currently employed?

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1 A. No.

2 Q. Were you employed at the time of this
3 incident?

4 A. No.

5 Q. Did I ask you if you're married?

6 A. Yes, you did.

7 Q. Okay. You live at Old Mill Road with
8 your three kids?

9 A. Yes.

10 Q. Their father or --

11 A. Alone.

12 Q. -- alone?

13 A. Myself.

14 Q. Just the three, the four of y'all?
15 I'm sorry.

16 A. Yes.

17 Q. Did you know whose car your brother
18 was driving, or truck, as you recall it?

19 A. No.

20 MR. GUYNN: I don't have any other
21 questions.

22 E X A M I N A T I O N

23 BY MR. VALOIS:

24 Q. Aquasha, I got to ask you a couple
25 questions. All right.

1 When they took you to jail, you said
2 you were in jail five to seven day?

3 A. Uh-huh.

4 Q. You were in solitary?

5 A. What is that?

6 Q. Were you in a room by yourself the
7 whole time?

8 A. Yeah, I was in a room by myself.

9 Q. So this would have been in the intake
10 department?

11 A. Yeah. The holding cell.

12 Q. Well, is it in the basement in the
13 intake department? Do you know?

14 A. In the basement?

15 Q. You wouldn't know, would you? Yeah.
16 Because you can't tell from inside. Let me
17 rephrase.

18 Was there a room with a big counter
19 in the middle where the jailer sat, where the
20 correctional officer sat?

21 A. I want to say yes. I don't really
22 remember what it looked like.

23 Q. But you were in a room by yourself?

24 A. Yes.

25 Q. Did you get to watch TV?

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1 A. No. There was no TV.

2 Q. Did you get books?

3 A. No.

4 Q. Did you spend 24 hours 7 in the same
5 cell?

6 A. Yes.

7 Q. Right. By yourself?

8 A. Yeah.

9 Q. Were you strip searched?

10 A. Strip searched?

11 Q. Did they -- were you forced to get
12 naked and get searched before they --

13 A. Yes.

14 Q. You had to go through that?

15 A. Uh-huh.

16 Q. All right. Did you enjoy that?

17 A. No.

18 Q. No? Was it humiliating?

19 A. Yeah.

20 Q. All right. And when you got out, you
21 were on bond?

22 A. Yes.

23 Q. And did you -- were you living with
24 your mom then still?

25 A. Yes.

1 Q. And were you allowed to travel freely
2 while you were on bond?

3 A. No.

4 Q. All right. And that just got
5 resolved when, last year; right? Your case got
6 resolved last year; is that right?

7 A. Yes.

8 Q. You had a different attorney. I
9 wasn't representing you in your case; correct?

10 A. Yes.

11 Q. Do you remember your attorney's name?

12 A. I do not.

13 Q. But your charges were ultimately
14 dismissed; right?

15 A. Yes.

16 MR. VALOIS: All right. I don't have
17 any further questions.

18 MR. GUYNN: Do you want to read?

19 MR. VALOIS: Yeah. Might as well.

20 (Reading and signature reserved.)

21 (Deposition concluded at 10:47 a.m.)

22 *****

23

24

25

COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

I, KIMBERLY A. HENDERSON, a
Registered Professional Reporter and Electronic
Notary Public in and for the Commonwealth of
Virginia at Large, Notary Registration Number
359658, whose commission expires November 30, 2025,
do certify that the aforementioned appeared before
me, was sworn by me, and was thereupon examined by
counsel; and that the foregoing is a true, correct,
and full transcript of the testimony adduced to the
best of my ability.

I further certify that I am neither
related to nor associated with any counsel or party
to this proceeding, nor otherwise interested in the
event thereof.

Given under my hand and Notarial seal
at Forest, Virginia, this 8th day of November,
2024.

A handwritten signature in dark ink, appearing to read "Kimberly A. Henderson", is written over a horizontal line.

Kimberly A. Henderson, Notary Public
Commonwealth of Virginia at Large

CHANGES REQUESTED TO THE DEPOSITION OF:

AQUASHA SANDIDGE

TAKEN ON: October 25, 2024

Page/Line:	From:	To:	Reason:
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AQUASHA SANDIDGE

COMMONWEALTH OF VIRGINIA to wit:
Subscribed to and sworn before me
this _____ day of _____
My commission expires _____

Notary Public

(AFFIX NOTARY SEAL)

A	14:17 associated 25:13 ASSOCIATES 2:12 assume 4:16 attorney 2:8 24:8 attorney's 24:11 Avenue 2:16 aware 6:15 6:15	9:15, 9:22, 15:9 21:17 CARROLL 2:16 case 1:5, 24:5 24:9 catch 14:5 cell 18:22, 18:24 19:2, 19:4, 19:9 22:11, 23:5 certify 25:7 25:12 chance 16:18 CHANGES 26:1 charges 24:13 checked 18:15 children 5:17 Church 2:8 City 1:6, 2:8 clarify 4:15, 8:7 clothes 12:25 College 2:16 come 12:15 coming 13:17 commencing 2:6 commission 25:6, 26:22 Commonwealth 2:6, 25:1, 25:4 25:24, 26:21 concluded 24:21 conflating 17:15 conversation 8:16 correct 24:9 25:9 correctional 22:20 counsel 2:10 2:15, 2:20, 25:9 25:13 counter 22:18 couple 21:24 court 1:1, 4:20	20:1, 20:8 currently 20:25	employed 20:25 21:2 enjoy 23:16 ESQUIRE 2:14 2:19, 2:19 et 1:3, 1:6 event 25:15 Examination 3:4, 3:5 examined 25:8 experiences 20:16 expires 25:6 26:22
ability 25:11 actual 13:2 adduced 25:10 AFFIX 26:25 aforementioned 25:7 ago 10:24 agreed 16:10 16:12 agreement 2:3 al 1:3, 1:6 allow 13:11 13:12, 13:13 allowed 24:1 and/or 2:3 answer 4:15 4:23, 4:23, 5:2 15:1, 15:3 anybody 18:13 anyway 9:25 10:6 apartment 7:5 9:5, 14:10 appear 8:15 APPEARANC... 2:10 appeared 25:7 April 6:8, 6:12 Aquasha 1:9 2:1, 3:3, 4:3, 5:7 21:24, 26:2 26:19 area 18:25 arrest 13:11 13:13 arrested 13:16 14:4, 14:18 15:7 asked 15:18 15:24, 15:25 17:9, 18:3 asking 4:12 9:12, 12:7 assist 13:22	B back 11:3, 11:15 11:15, 11:23 12:17 background 6:4 basement 22:12 22:14 beginning 19:4 behalf 2:2 believe 7:14 11:10, 15:21 18:11 best 25:11 big 18:25, 22:18 bit 9:24 bond 23:21 24:2 books 23:2 bring 11:14 brother 6:23 7:17, 8:17, 9:1 9:22, 13:23 14:17, 21:17 brought 4:10 11:2, 11:23 BROWN 1:3 bunch 18:16		D dad 12:14 12:15 day 16:24, 22:2 25:17, 26:22 days 19:8, 19:12 dead 8:7 defendants 1:7 2:2, 2:20, 4:10 department 22:10, 22:13 Deposition 1:9 2:1, 24:21, 26:1 depositions 2:3 describe 17:3 detective 10:9 12:23, 16:4 16:13 detectives 13:3 different 13:1 24:8 dismissed 24:14 distracted 10:6 DISTRICT 1:1 1:1 DIVISION 1:2 doing 13:19 13:25, 14:4 door 9:5, 12:17 downtown 15:13, 15:14 17:9 driving 21:18	
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	help 4:24, 8:6	jimg@guynnw... 2:18	LOCKABY 2:16	mother's 7:4 7:5, 9:5
Given 25:16	helpful 17:2	JOHN 2:19	locked 18:7	moved 10:22
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